

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

V.

RAYNALDO RIVERA ORTIZ, JR

CASE NO. 3:22-CR-00378-N

**MOTION FOR ENTRY OF PROTECTIVE ORDER**

Non-party Baylor Scott & White Surgicare North Dallas (“BSND”) files this motion for entry of a protective order and respectfully asks this Court to enter the Protective Order submitted with this motion. In support thereof, BSND shows as follows:

1. On February 16, 2024, Defendant Raynaldo Rivera Ortiz, Jr. served BSND with an Ex-Parte Subpoena Duces Tecum per Federal Rule of Criminal Procedure 17. (See Dkt. 53.)

2. BSND and Ortiz have been actively discussing the scope and content of any production and have worked amicably to resolve disputes to this point. Among other things, the subpoena calls for production of medical records and documents containing sensitive information. To facilitate the production of such records and to protect the private information contained within the records, the parties agree that a protective order is appropriate and necessary.

3. Undersigned counsel for BSND has conferred with counsel for Ortiz and counsel for the United States. Counsel for Ortiz has agreed to the terms of the Protective Order submitted with this motion. At the time of filing, counsel for the United States has not responded.

4. For the forgoing reasons, BSND respectfully asks this Court to enter the Protective Order.

Dated: March 4, 2024

Respectfully submitted,

By: /s/ J. Nicholas Bunch

**J. Nicholas Bunch**

State Bar No. 24050352

Haynes and Boone LLP

2801 N. Harwood St., Suite 2300

Dallas, Texas 75201

Tel: (214) 651-5000

Fax: (214) 651-5940

*nick.bunch@haynesboone.com*

ATTORNEY FOR BSND

**CERTIFICATE OF SERVICE**

I, J. Nicholas Bunch, counsel for Baylor Scott & White Surgicare North Dallas, certify that a copy of the foregoing Motion for Entry of Protective Order with attachments, was delivered to all involved parties by the CM/ECF System on the 4<sup>th</sup> Day of March, 2024.

/s/ J. Nicholas Bunch

J. Nicholas Bunch

**CERTIFICATE OF CONFERENCE**

I, J. Nicholas Bunch, certify that I conferred with counsel for defendant Ortiz (John Nicholson) and counsel for the United States (John DelaGarza and Patrick Runkle) regarding the relief requested herein and entry of the Protective Order. Counsel for defendant Ortiz does not oppose this motion or entry of the protective order. At the time of filing, counsel for the United States has not responded.

/s/ J. Nicholas Bunch  
J. Nicholas Bunch